

Exhibit L

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

JOSHUA MELLO and RACHEL WARE,

Plaintiffs,

VS.

C.A. No. 1:23-cv-00480-JJM-PAS

DEREK GUSTAFSON, TIMOTHY VESEY,
STEVEN CATALANO, JOHN ROCCHIO and
EDWARD ARRUDA,

Defendants.

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VIDEOCONFERENCE DEPOSITION

OF JOSHUA MELLO, a Pro Se Plaintiff in the above-  
entitled matter, conducted by Julia K. Scott-  
Benevides, Esq., on behalf of the Defendants,  
conducted remotely via Zoom, on August 15, 2024,  
before Adam M. Derham, CSR, RPR, and Notary Public in  
and for the State of Rhode Island.

APPEARANCES OF COUNSEL

On Behalf of the Defendants:

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(VIA VIDEOCONFERENCE)

1 have a concussion. I don't recall who I spoke to.

2 But, yes, obviously, I indicated to them why I was  
3 there, clearly.

4 Q. And were you told that they were going to go get  
5 your daughter? What was the conversation that you had?

6 A. They wanted to get hung up on a masking issue,  
7 if I recall, from the trial and stuff and all the  
8 nonsense that's gone back and forth over the years. That  
9 was the initial problem: a mask, mask incompliance, if I  
10 recall properly.

11 Q. So, while there was a problem with a mask, did  
12 anyone else come out to talk to you?

13 A. As I indicated before, several people came out  
14 and talked to me from the vice principal, principal; and,  
15 in that term, they found out, yes, they needed to release  
16 my daughter. Correct.

17 Q. And, when you say -- do you know who came out  
18 first: the vice principal or principal?

19 A. To the best of my recollection, it was a female.

20 Q. Do you recall that individual's name?

21 A. No, not off the top of my head, I don't.

22 Q. At some point did --

23 A. It was the staff for sure, like, faculty, not,  
24 like, administration. She was like an administrator or  
25 something.

1 A. Correct, but it didn't get that far.

2 Q. Okay. And I'm trying to piece together  
3 what happened, between this masking conversation and,  
4 you know, you wanting to pick up your daughter, with  
5 Ms. Coutu and Principal Vesey coming over.

6 What happened in between that; like, what led up to  
7 that, that you can recall?

8 A. I don't recall. I know that they came out.  
9 He came over, and he was engaging. A lot of this is just  
10 based off what I can recall from the video 'cause I told  
11 you: I don't recall the conversation. I had my head  
12 thrown to the ground. I had a concussion and a blackout;  
13 so a good percentage of what even happened at that  
14 point --

15 THE WITNESS: Hold on. I've got to plug in my  
16 computer, though. Sorry.

17 A. -- still is -- is -- is missing.

18 But, standing there and talking to them, it all  
19 seemed just like what's going on, you know, more of a  
20 confusion aspect, if anything, more than anything.

21 Q. And what was the confusion about?

22 A. Well, mostly it seemed to be over masking, I  
23 would say. It was a whole confusing over masking,  
24 like, and what -- what was gonna take place. It was all  
25 like -- and then, once I went back inside, I went over

1 speech, to the best of my abilities, because what was  
2 happening was disgusting; so I was probably speaking.

3 I can't say what I was saying, but it wasn't worth  
4 being slammed on the head of a cruiser -- on the hood of  
5 a police cruiser for sure. I can tell you that much.

6 Q. And, as you walked out of the building, what was  
7 your body doing: Were you still and, like, letting them  
8 escort you out?

9 A. Yes. I was fully compliant at that point; maybe  
10 looking around a little bit to try to see where Rachel  
11 was. The only thing is I says, 'cause I can see it on  
12 the video from the surveillance at this point, after  
13 being -- having my head slammed off the ground, I was  
14 in -- I had a concussion. I was blacked out. A lot of  
15 that vestibule/hood stuff, for a little while, was  
16 missing until I started watching the surveillance.

17 Q. You continued to push your body back on the  
18 officers, though; right?

19 A. No, I did not. As seen in the video, I was  
20 fully compliant walking, never pushed against anybody.

21 Q. And you've seen all of the videos, whether it be  
22 the videos that you and Ms. Ware took or the videos on  
23 the school surveillance; correct?

24 A. I have watched them, correct.

25 Q. Okay. And, watching yourself back on the

1 the specifics, and I don't want to say anything 'cause  
2 I'm not a hundred percent sure. It's a lot of vague --  
3 a lot of not vagueness, but it's unclear. I had a pretty  
4 significant head injury, and some stuff isn't as vague  
5 enough.

6 I didn't even remember some of the stuff that  
7 happened at the school until I literally saw it. I  
8 remember only being smashed off the hood of the cruiser  
9 only because I saw it with my own eyes. If I never saw  
10 that video, I would have never have remembered it  
11 happening. That's how severe of a head injury I have.

12 Q. Okay. I'm going to take down **Exhibit D**, and  
13 you testified that you were seeking counseling with your  
14 daughter. Do you know that counselor's name?

15 A. Eugenia Silva.

16 Q. And do you know where she's out of?

17 A. Cranston, Pike -- Putnam -- Plainfield Pike?  
18 Putnam Pike? I think it's, like, 44. They've got a  
19 new Seasons, a couple of gas stations over there. It's  
20 right up the street from -- so you go by the -- if you  
21 go by the, what you call it there -- the BLE, the  
22 election -- the election joint there. Oh, my goodness.

23 Yeah, so you come up past the Walmart. You pass  
24 that -- the election joint, and you keep going up the  
25 hill. You pass the farm, what's that, Pezza Farm. You